

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON, MASSACHUSETTS**

SHIVA AYYADURAI, an individual,)
)
)
Plaintiff,)
)
)
v.) CASE NO. 16-cv-10853(NMG)
)
)
GAWKER MEDIA, LLC, a Delaware)
limited liability company; SAM BIDDLE, an)
individual, JOHN COOK, an individual,)
NICHOLAS GUIDO ANTHONY DENTON,)
an individual, and DOES 1-20,)
)
)
Defendants.)
)

STIPULATED MOTION FOR STAY OF PROCEEDINGS

Because of the ongoing settlement discussions described below, the Parties in this action request that this Court stay all proceedings for 30 days, until February 24, 2017

At a hearing on December 13, 2016, Judge Bernstein of the U.S. Bankruptcy Court for the Southern District of New York approved a proposed settlement in the bankruptcy of Defendant Gawker Media, LLC (“Gawker”) that would resolve this action as to all Defendants herein. An Order confirming the plan was entered on December 22, 2016. The parties anticipate that the settlement will become effective within the next thirty days, which would trigger certain obligations on Defendants’ parts and, in turn, Plaintiff’s obligation to dismiss this case.

Accordingly, the Parties request that this Court stay any required pending actions in this matter for thirty days, until February 24, 2017, at which time the Parties will further update the Court as to the case status.

Dated: January 24, 2017

Respectfully submitted,

CORNELL DOLAN, P.C.

By: /s/ Timothy Cornell

Timothy Cornell, BBO # 654412
One International Place, Suite 1400
Boston, MA 02110
Tel: (617) 535-7763
Fax: (617) 535-7721
tcornell@cornelldolan.com

HARDER MIRELL & ABRAMS LLP

By: /s/ Charles J. Harder

Charles J. Harder, Esq.
(*Pro Hac Vice application to be filed*)
132 S. Rodeo Drive, Suite 301
Beverly Hills, California 90212
Tel. (424) 203-1600
Email: CHarder@HMAfirm.com

Counsel for Plaintiff Shiva Ayyadurai

By: /s/ Rachel Strom

Rachel F. Strom, BBO # 666319
LEVINE SULLIVAN KOCH & SCHULZ, LLP
321 West 44th Street, Suite 1000, New York, NY 10036
Tel: (212) 850-6100/Fax: (212) 850-6299
rstrom@lskslaw.com

Counsel for Defendants Gawker Media, LLC, Sam Biddle, John Cook

RULE 7.1 CERTIFICATE OF SERVICE

I hereby certify that, in accordance with Local Rule 7.1, we conferred with Counsel for the Defendants and they have agreed to the above-filed Stipulated Motion to Stay Proceedings.

/s/ Timothy Cornell

CERTIFICATE OF SERVICE

I hereby certify that the above document is to be filed through the ECF system and will be sent electronically to Rachel Strom and Kate Bolger, Counsel for the Defendants.

/s/ Timothy Cornell